

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**SHAMES DELAHAYE, Individually and on  
Behalf of All Others Similarly Situated**

**PLAINTIFF**

vs.

No. 2:22-cv-11341-LVP-KGA

**PILGRIM AUTO, LLC, and MARTIN YOUNCE**

**DEFENDANTS**

**PLAINTIFF'S MOTION FOR TELEPHONIC STATUS CONFERENCE**

Plaintiff Shames Delahaye, by and through his undersigned counsel, submits the following for his Motion for Telephonic Status Conference:

1. On January 22, 2024, the parties notified the Court that they had reached a settlement in principle that would resolve Plaintiff's alleged claims, leaving open the issue of a reasonable attorneys' fee and costs of the action. Plaintiffs' Notice of Settlement, ECF No. 16.

2. Plaintiff's counsel sent an initial draft of a liability settlement agreement document to Defendants' counsel on February 21, 2024.

3. On March 13, Plaintiff's counsel followed up with Defendants' counsel over email. Defendant's counsel did not respond.

4. On March 25, Plaintiff's counsel called Defendants' counsel to determine the status of the draft agreement. Defendants' counsel indicated that edits to the agreement would be forthcoming, and sent an email message to Plaintiffs' counsel, the first ever since the Parties reached a settlement in principle, with the following message: "Checking."

5. Plaintiff's counsel again followed up via phone call and voicemail on April 16, to no avail.

6. Defendant has stopped engaging with Plaintiff regarding the settlement documents and progress towards finalizing settlement documents has been stalled.

7. Plaintiff requests that the Court order a telephonic status conference with the magistrate judge for scheduling the next steps.

8. Counsel for Plaintiff reached out to counsel for Defendant to determine their stance as to this Motion. However, no answer has been received.

WHEREFORE, premises considered, Plaintiff prays that the Court grant this Motion to set a status conference before the magistrate judge, and for all other necessary and proper relief.

Respectfully submitted,

**SHAMES DELAHAYE, Individually  
and on Behalf of All Others  
Similarly Situated, PLAINTIFF**

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